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September 15, 2004

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Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, N.E., Suite 110  
Washington, DC 20002

Re: Request for Special Temporary Authority to Conduct In-Orbit Testing of  
IA-8; Call Sign: S2160

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for 60 days to allow in-orbit testing of Intelsat Americas 8 ("IA-8") (formerly known as Telstar-8) in the C-, Ku- and Ka-bands at 109.2° W.L.<sup>2</sup> Intelsat requests that the 60-day period begin upon the launch of IA-8, which currently is expected to occur in mid-November 2004.<sup>3</sup> In support of its request, Intelsat submits the following information.

The Commission originally authorized Loral SpaceCom Corporation ("Loral") to launch the former Telstar-8 satellite and to operate it at 77.0° W.L.<sup>4</sup> The Commission in 2003 authorized the satellite to operate instead at 89.0° W.L.<sup>5</sup> Intelsat, which now owns the satellite, fully intends to operate IA-8 at the 89.0° W.L. location pursuant to that authorization.

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159 and a \$735.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> Intelsat also will conduct TTC&M operations for the satellite in the C-band.

<sup>3</sup> On July 27, 2004, Intelsat filed a request to extend the launch milestone for IA-8 from September 30, 2004 until March 30, 2005 due to unforeseeable circumstances beyond Intelsat's control relating to the IA-8 launch vehicle. See Public Notice, *Policy Branch Information, Satellite Space Applications Accepted for Filing*, Rept. No. SAT-00234, File No. SAT-MOD-20040727-00148 (Aug. 13, 2004). At this time, the launch provider has not given Intelsat a firm launch date.

<sup>4</sup> *Applications of Loral Space & Communications Ltd.; For Authority to Construct, Launch and Operate Space Stations in the Domestic Fixed-Satellite Service*, Memorandum Opinion and Order, 11 FCC Rcd 20441, 20444 (Int'l Bur. 1996).

<sup>5</sup> *Loral SpaceCom Corporation and Loral Space & Communications Corp.; Applications for Modification of Fixed-Satellite Service Space Station Authorization; Applications for Extension of Milestone Dates; Request for Extension of Time to Construct, Launch, and Operate a Ka-band Satellite System in the Fixed Satellite Service*, Memorandum Opinion, Order and Authorization, 18 FCC Rcd 6301, 6315-16 (Int'l Bur. 2003).

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Intelsat has, however, been asked by WildBlue Communications, Inc. (“WildBlue”) to place IA-8 at 109.2° W.L. on a temporary basis prior to the satellite beginning operations at 89.0° W.L. WildBlue is licensed to operate its WildBlue-1 satellite at the 109.2° W.L. location. WildBlue intends temporarily to provide service in Ka-band at the 109.2° W.L. location using the IA-8 satellite.<sup>6</sup> During the time that WildBlue will be providing Ka-band service at 109.2° W.L. using the IA-8 satellite, WildBlue will own the Ka-band payload on the satellite.

Intelsat is coordinating the planned in-orbit C-, Ku- and Ka-band testing of IA-8 with Telesat, which is currently operating satellites at 109.2° W.L. (Anik E1) and at 107.3°W (Anik F1) and shortly will be operating a satellite at 111.1° W.L. (Anik F2), and with SES AMERICOM, which is operating satellites at 105.0° W.L. and 103.0° W.L.<sup>7</sup> Intelsat does not intend to provide service on IA-8 in the C-, Ku- or Ka-bands at 109.2° W.L.<sup>8</sup> In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.<sup>9</sup>

The in-orbit C-, Ku- and Ka-band testing of IA-8 at 109.2° W.L. is a critical step in ensuring that the satellite will be fully operational at 89.0° W.L. This, in turn, will provide consumers with satellite communications services at the 89.0° W.L. location, and thereby promote the public interest.

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<sup>6</sup> WildBlue is separately seeking FCC temporary authorization to provide Ka-band service at 109.2° W.L.

<sup>7</sup> Telesat has informed Intelsat that it will move Anik E1 in order to accommodate the co-location of IA-8. Intelsat also has notified Mexico, the operator of satellites at 113.0° W.L. and 114.9° W.L., of the planned in-orbit testing of IA-8 at 109.2° W.L.

<sup>8</sup> As noted above, WildBlue temporarily will provide service at 109.2° W.L. using the Ka-band payload on IA-8. WildBlue currently owns the Ka-band payload on the satellite.

<sup>9</sup> The specific bands that Intelsat will use at 109.2° W.L. are 5925-6425/3700-4200 MHz (C-band); 14.0-14.5/11.7-12.2 GHz (Ku-band); and 29.5-30/19.7-20.2 GHz (Ka-band).

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For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this request.

Sincerely,

Jennifer D. Hindin

cc: Tom Tycz  
Cassandra Thomas  
Andrea Kelly  
Karl Kensinger  
JoAnn Lucanik